



Order Filed on December 30, 2019  
by Clerk

Case No.: 19-14955  
U.S. Bankruptcy Court  
District of New Jersey

Chapter: 13

Hearing Date:  
December 18, 2019 at 10:00 AM

Hon. Judge:  
Rosemary Gambardella

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

Friedman Vartolo LLP  
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Attorneys for Secured Creditor Fay Servicing, LLC as  
Servicer for Wilmington Trust, National Association,  
not in its individual capacity, but solely as Trustee of  
MFRA Trust 2015-1

In Re:

Ronald Jones  
Kathleen Jones

Debtor(s)

**CONSENT ORDER RESOLVING MOTION TO VACATE STAY**

The consent order set forth on the following pages, numbered two (2) through three (3), is hereby  
**ORDERED.**

**DATED: December 30, 2019**

A handwritten signature in cursive script, reading "Rosemary Gambardella".  
Honorable Rosemary Gambardella  
United States Bankruptcy Judge

Applicant: Fay Servicing, LLC  
Applicant's Counsel: Friedman Vartolo LLP  
Debtor's Counsel: David E. Sklar  
Property (Collateral): 10 Wood Street, Wayne, NJ 07470

Relief Sought:

- Relief from Automatic Stay

For good cause shown, it is **ORDERED** that Applicant's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of Post-Petition Arrearages:

- The Debtor is current on their post-petition payments through November 1, 2019.
- The Debtor is short for the **December 1, 2019** payment by \$6.62.

2. Cure for Post-Petition Arrearages:

- Beginning on **January 1, 2020**, regular monthly payments shall resume in the amount of **\$4,363.07**, or as further defined by the terms of the Note, Mortgage, or any payment change notices.
- The Debtor shall remit the \$6.62 payment with the regular January 1, 2020 mortgage payment.

3. Payments to the Secured Creditor shall be made to the following address:

- Payments: Fay Servicing, LLC  
P.O. Box 814609  
Dallas, TX 75381

In the event of default:

If the Debtor(s) fails to make the regular monthly payments within thirty (30) days of the date the payments are due, then the Secured Creditor may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, Certification specifying the Debtor(s)'s failure to comply with this Order upon notice and a hearing. At the time the Certification is filed with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtor(s), and the Debtor(s)'s Attorney.

4. Award of Attorney's Fees:

- The Applicant is awarded Attorney's Fees in the amount of \$350.00 and Attorney's Costs in the amount of \$181.00. The fees and costs are payable through the Chapter 13 Plan.

The undersigned hereby consent to the form and entry of the foregoing order.

  
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David E. Sklar  
*Attorney for Debtor*

/s/ Jonathan Schwalb, Esq.  
Jonathan Schwalb, Esq.  
*Attorney for Secured Creditor*